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from facts set out in the complaint. See *Louisville, etc., R. Co. v. Anchors*, 114 Ala. 492, 22 South. 279; *Birmingham Light & Power Co. v. Brown*, *supra*.

The principal case seems to be in accord with the modern authorities in its holding that there need be no express averment of the intent to inflict the injury in charging willful injury.

TELEGRAPH AND TELEPHONES—DELAY IN DELIVERY OF MESSAGE—DAMAGES FOR MENTAL ANGUISH.—The plaintiff sued to recover for mental anguish occasioned by the failure of the telegraph company to promptly transmit a message to her father-in-law requesting his presence to comfort her during her husband's serious illness. *Held*, the defendant is liable. *Western Union Tel. Co. v. Holland* (Ala.), 66 South. 926. See NOTES, p. 457.